

REMARKS

Applicant wishes to thank the Examiner for the attention accorded to the instant application, and respectfully requests reconsideration of the application as amended.

Formal Matters

Applicant thanks the Examiner for review and consideration of the references cited in the Information Disclosure Statement (IDS) filed with the application on July 14, 2003. Applicant respectfully requests consideration of references cited in the IDS filed December 1, 2006.

Applicant thanks the Examiner for acknowledgement of a claim for foreign priority under 35 U.S.C. §119 (a)-(d) or (f), and acknowledgement of receipt of all certified copies of the priority documents.

Specification

The Examiner found that the title of the invention is not descriptive. Applicant submits a new title that is clearly indicative of the invention to which the claims are directed.

Rejection of Claims 1-12 Under 35 U.S.C. §103

Claims 1-12 are rejected under 35 U.S.C. § 103(a) as unpatentable over Stekelenburg, U.S. Patent No. 6,727,939 in view of Mizobuchi, U.S. Patent No. 6,160,967. This rejection should be withdrawn based on the comments and remarks herein.

Among the problems recognized and solved by Applicant's claimed invention is a need for a camera module enabling two cameras to be mounted while minimizing mounting area and complexity of wiring, and for a mobile communication terminal using such a camera module. In one embodiment, the present inventive apparatus includes two camera units mounted on the same face of a flexible substrate such that when the flexible substrate is bent, the field of view of one

camera unit is the reverse of the field of view of the other camera unit. Another inventive embodiment discloses two camera units mounted on different faces of a flexible substrate.

Stekelenburg discloses a portable television camera having an auxiliary camera added to the portable television camera enabling the camera operator to view a scene behind and or next to him (column 1, lines 31-35). Stekelenburg further discloses having a built-in camera module comprising one flexible mechanical coupling (FC), and a portable television camera unit (PTC) and an auxiliary camera (AC) connected by this flexible substrate so that the directions of their fields of view are reversed to each other (see column 2, lines 7-20). The Examiner alleges that Stekelenburg discloses “first and second camera units mounted on different faces of this flexible substrate” as recited in independent claims 2, and 6. Applicant disagrees.

Stekelenburg discloses an auxiliary camera coupled to the housing of the portable television camera unit via the flexible coupling. Figure 1b of Stekelenburg shows that the auxiliary camera is not mounted on the face of the flexible coupling but instead is connected to one end of the coupling. The portable television camera unit is connected to other end of the coupling. Further, Stekelenburg is silent about “face” or “mount” and only teaches coupling. Thus, Stekelenburg does not disclose “first and second camera units *mounted on different faces* of this flexible substrate” as recited in independent claims 2, and 6.

The Examiner acknowledges that Stekelenburg does not disclose cameras mounted on the same surface of a flexible substrate as recited in independent claims 1 and 5, but contends that Mizobuchi discloses this feature. Applicant disagrees.

Mizobuchi discloses arranging components, such as IC chips and other electronic parts, on a flexible printed circuit board (column 3, lines 58-59). The flexible PCB is bent and mounted within a camera body (column 4, lines 1-5). Mizobuchi does not disclose or suggest

mounting camera units on the flexible PCB, and does not disclose or suggest “first and second camera units mounted on the same face of this flexible substrate” as recited in independent claims 1, and 5.

It has been held by the courts that to establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. See, *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). As illustrated above, the hypothetical combination of Stekelburg and Mizobuchi does not disclose or suggest each and every feature of the present invention as recited in the independent claims, so that *prima facie* obviousness has not been established. Thus, claims 1, 2, 5 and 6 are patentably distinguishable over the art of record in the application. Further, claim 3 depends from claim 1, claim 4 depends from claim 2, claims 7, 9, and 11 depend either directly or indirectly from claim 5, and claims 8, 10, and 12 depend either directly or indirectly from claim 6, each dependent claim incorporating all of the features and limitations of its base claim. Thus the dependent claims are patentable over the art of record in the application for at least the reasons that their base claims are patentable over the art of record. Accordingly, applicant requests that this rejection be withdrawn.

Rejection of Claims 13-16 Under 35 U.S.C. §103

Claims 13-16 are rejected under 35 U.S.C. § 103(a) as unpatentable over Stekelburg in view of Mizobuchi, as applied to claim 9 above, and further in view of Lee, et al., U.S. Patent Application Publication No. 2004/0212709 (hereinafter “Lee”). This rejection should be withdrawn based on the comments and remarks herein.

As discussed above, the hypothetical combination of Stekelburg and Mizobuchi does not disclose or suggest all of the features of independent claims 5 and 6. Lee does not cure this deficiency, and the Examiner does not assert otherwise. Thus, *prima facie* obviousness of these

claims had not been established. Claims 13 and 15 depend indirectly from claim 5, and claims 14 and 16 depend indirectly from claim 6, each dependent claim incorporating all of the features and limitations of its base claim. Thus, claims 13-16 are distinguishable over the art of record in the application for at least the reasons that independent claims 5 and 6 are patentably distinguishable over the art of record in the application. Thus, applicant requests that this rejection be withdrawn.

Conclusion

In light of the foregoing, Applicant respectfully submits that all pending claims recite patentable subject matter, and kindly solicits an early and favorable indication of allowability. If the Examiner has any reservation in allowing the claims, and believes a further telephone interview would advance prosecution, he is kindly requested to telephone the undersigned at his earliest convenience.

Respectfully Submitted,



Katherine R. Vieyra
Registration No. 47,155

SCULLY, SCOTT, MURPHY & PRESSER, P.C.
400 Garden City Plaza - Suite 300
Garden City, New York 11530
(516) 742-4343 (telephone)
(516) 742-4366 (facsimile)
KRV:vh